

# EXHIBIT B

Page 1

1 SUPERIOR COURT OF NEW JERSEY  
2 LAW DIVISION - MIDDLESEX COUNTY  
3 DOCKET NO. MID-L-003809-18AS

4  
5 KAYME A. CLARK and )  
6 DUSTIN W. CLARK, ) 104 HEARING  
7 v. )  
8 )  
9 Plaintiffs, ) TRANSCRIPT OF  
10 ) PROCEEDINGS  
11 )  
12 ) (VOLUME I)  
13 )  
14 )  
15 )  
16 )  
17 )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )  
-----  
JOHNSON & JOHNSON, et al., )  
et al., )  
Defendants. )

11  
12 Place: Middlesex County Courthouse  
13 56 Paterson Street  
14 New Brunswick, New Jersey 08903

15 Date: May 29, 2024  
16 9:02 a.m.

17 B E F O R E:

18 HONORABLE ANA C. VISCOMI, J.S.C.

19  
20  
21 ANDREA F. NOCKS, CCR, CRR  
22 PRIORITY ONE  
23 290 West Mount Pleasant Avenue  
24 Livingston, New Jersey 07039  
25 (718) 983-1234  
E-mail: plsteno@veritext.com

Page 2

1 A P P E A R A N C E S:  
2 DEAN OMAR BRANHAM SHIRLEY LLP  
3 BY: BENJAMIN BRALY, ESQ.  
3 302 North Market Street  
4 Suite 300  
Dallas, Texas 75202  
5 Attorneys for Plaintiffs  
6  
7

8 KING & SPALDING  
9 BY: MORTON D. DUBIN II, ESQ.  
KEVIN HYNES, ESQ.  
10 1185 Avenue of the Americas  
34th Floor  
New York, New York 10036

11 -AND-  
12 McCARTER & ENGLISH  
13 BY: JOHN C. GARDE, ESQ.  
Four Gateway Center  
100 Mulberry Street  
Newark, New Jersey 07102  
14 Attorneys for Defendant,  
Johnson & Johnson

15  
16 ALSO PRESENT: DERELL WILSON, ESQ.  
17 EARLY, LUCARELLI,  
SWEENEY & MEISENKOTHEN  
18  
19  
20  
21  
22  
23  
24  
25

Page 3

1 INDEX  
2

3 WITNESS

4 DIRECT

CROSS

5 WILLIAM EDWARD LONGO

7 EXAMINATION BY:

8 MR. DUBIN

9

10 MR. BRALY

174

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Page 43

1 A. That's correct.

2 Q. And, in fact, you said that as of  
3 2019 you had never analyzed a sample of talc for the  
4 presence of asbestos from start to finish using PLM,  
5 correct?

6 A. Correct.

7 Q. And at least as of 2023, when we last  
8 asked you, you said you had never taken any classes  
9 in the type of PLM analysis we're going to be  
10 talking about which is referred to as PLM dispersion  
11 staining, not a single class, right?

12 A. No, sir.

13 Q. So, it's correct you didn't take a  
14 class, right?

15 A. Never taken a class in PLM analysis  
16 to understand how to identify asbestos in  
17 asbestos-added products.

18 Q. You are a self-taught PLM  
19 analysis -- analyst, right?

20 A. Yes, sir. I don't want to sound, you  
21 know, braggadocios, but I have a Ph.D. in material  
22 science and engineering where you know everything  
23 about every type of microscope, et cetera, and  
24 typically Ph.D. levels don't take basic PLM classes.  
25 I know the science really well on PLM. I could

Page 44

1 analyze those samples but it would take me all day  
2 so I don't do it.

3 Q. Okay. We'll talk more about that a  
4 little bit later but...

5 And if we look at the reports in  
6 which MAS has claimed to find chrysotile in  
7 Johnson & Johnson, you can see the names of the  
8 people who actually did the analysis, right?

9 A. Correct.

10 Q. And you are never listed as the  
11 analyst?

12 A. Well, the only people that is listed  
13 as the analyst is the person that goes from start to  
14 finish. When I sit down or there's a structure that  
15 there's some debate on it and I sit down and look at  
16 it and go through it, I don't put my name down for  
17 one structure. That's not fair.

18 Q. Okay. But, again, the analyst would  
19 typically be somebody like a Paul Hess, right?

20 A. Correct.

21 Q. Okay. But you, I think you just said  
22 you feel comfortable answering questions today about  
23 PLM dispersion analysis and how it's done at MAS,  
24 right?

25 A. Yes, sir.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored

in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).